

IN THE U.S. BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: Nicholas Zindel Epps, : Chapter 13  
Debtor : Bankruptcy No.: 21-10317-mdc

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**Hearing to be Held:**

**Date: May 18, 2021**

**Time: 10:30am**

**Place: United States Bankruptcy Court**

**Courtroom #2**

**Robert N.C. Nix Building**

**900 Market Street, Suite 400**

**Philadelphia, PA 19107-4299**

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**NOTICE OF MOTION, RESPONSE DEADLINE AND HEARING DATE**

Nicholas Zindel Epps, Movant-Debtor, by and through counsel of Ross, Quinn & Ploppert, P.C., has filed a Motion to Avoid the Judicial Lien of JMMMP Company.

**YOUR RIGHTS MAY BE AFFECTED. YOU SHOULD READ THESE PAPERS CAREFULLY AND DISCUSS THEM WITH YOUR ATTORNEY, IF YOU HAVE ONE IN THIS BANKRUPTCY CASE. (IF YOU DO NOT HAVE AN ATTORNEY, YOU MAY WISH TO CONSULT AN ATTORNEY.)**

1. If you do not want the court to grant the relief sought in the amended motion or if you want the court to consider your views on the motion, then on or before **May 12, 2021** you or your attorney must do ALL of the following:

(a). file an answer explaining your position at:

United States Bankruptcy Court  
Eastern District of Pennsylvania  
900 Market Street, Suite 400  
Philadelphia, PA 19107-4299

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above; and

(b) mail a copy to attorney for movant:

Joseph Quinn, Esquire  
ROSS, QUINN & PLOPPERT, P.C.  
192 S. Hanover Street, Suite 101  
Pottstown, PA 19464

2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above and attend the hearing, the court may enter an order granting the relief in the motion.

3. A hearing on the motion is scheduled to be held before the Honorable Magdeline D. Coleman, United States Bankruptcy Judge on May 18, 2021 at 10:30am in:

**United States Bankruptcy Court  
Courtroom #2  
Robert N.C. Nix Building  
900 Market Street  
Philadelphia, PA 19107-4299**

4. If a copy of the motion is not enclosed, a copy of the motion will be provided to you if you are on the Clerk's Service List and you request a copy from the attorney named in paragraph 1(b).

5. You may contact the bankruptcy clerk's office at 215-408-2800 to find out whether the hearing has been cancelled because no one filed an answer.

**ROSS, QUINN & PLOPPERT, P.C.**

By: /s/ Joseph Quinn  
Joseph Quinn, Esquire  
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Counsel for Debtor

Date: April 21, 2021